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Via ECFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte Presentation*
WC Docket No. 16-271
WT Docket No. 10-208
WC Docket No. 10-90

Dear Ms. Dortch:

On Tuesday, February 28, 2017, Kenneth Johnson of Herman & Whiteaker, LLC, Paul Kelly, General Manager and Chief Executive Officer of Cordova Telephone Company, Inc. and Cordova Wireless Communications, LLC (“Cordova”), and Vince Wiemer of Alexicon Consulting, met with Suzanne Yelen, Ryan Palmer, Alex Minard, and Jesse Jachman of the Federal Communications Commission (“FCC” or “Commission”) Wireline Competition Bureau (“WCB”); Amy Bender from the office of Commissioner O’Rielly; Claude Aiken from the office of Commissioner Clyburn; and Jay Schwarz from the office of Chairman Pai regarding universal service, middle mile transport, and the Alaska Plan. Cordova complemented the Commission for recognizing the unique nature of Alaska telecommunications with its release of the Alaska Plan and discussed particular challenges encountered in the provision of broadband and wireless communications in rural Alaska.

Cordova noted that federal universal service funding and a Rural Utilities Service (“RUS”) loan allowed Cordova to build a 100-mile fiber optic cable to connect the City of Cordova to Valdez, Alaska to Oregon, to the rest of the world. This cable has enabled Cordova to offer its customers high-speed broadband services and, with Cordova’s special roaming agreement with AT&T, high-speed VoLTE services throughout its service area. Although

federal funding has been a success story in Cordova, Cordova agreed with Commission policy that federal high-cost support should be efficiently targeted and that duplicative support should be eliminated. However, Cordova cautioned that care should be taken to ensure that wireless carriers in Alaska are not deprived of adequate and continued support when the FCC moves to eliminate overlapping support in five years pursuant to the Alaska Plan.

Cordova suggested that public safety concerns and the unique competitive nature of wireless service in Alaska make the use of reverse auctions such as those that will be used for the Mobility Fund inadvisable. Low populations and dispersed customer bases in Alaska simply do not support multiple robust competitors as in the “lower-48.” An auction that would eliminate one or more rural wireless providers would result in even less competition in Alaska. Further, with less carriers, roamers in Alaska (tourists, fishermen, hikers, etc.) would likely find their phones inoperable depending upon where they are roaming due to differing technologies and roaming agreements.

Cordova proposed that wireless universal service support in Alaska should be tied to the local exchange carrier (“LEC”) affiliated with the rural wireless carrier. If the rural wireless carrier wants to provide service outside the LEC service area, it can do so without support. This proposal would eliminate duplicative and overlapping support. Rural wireless carriers would have to make do with less support, but not zero support. Costs in Alaska are just too high to allow any carrier to lose all of its support under an auction scenario.

Cordova also discussed the Commission’s expertise in handling high-cost support funding and agreed with the position of Commissioner O’Rielly that blanket grants can lead to U.S. consumers paying too much for high-cost support or to spending scarce funds on duplicative efforts. Any Congressional funding ought to be used to populate the FCC’s universal service budget that is subject to Commission monitoring and service requirements.

Should you have any questions or require additional information, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/ Kenneth C. Johnson

Kenneth C. Johnson

cc: Nicholas Degani
Jay Schwarz
Amy Bender
Claude Aiken
Suzanne Yelen
Ryan Palmer
Alex Minard
Jesse Jachman